

**I. List: 205.606 Non-organically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”**

**II. Committee Summary:** Many comments were received supporting the retention of all five substances in section 205.606. In addition, comments were received opposing the re-listing of the substances on Section 205.606. These comments did not include adequate information supporting the removal of substances from the List as specified in the Federal Register notice regarding the Sunset of materials on the National List. The committee did not have data or evidence to support the position to remove any of the substances listed in Section 205.606.

Four of the five materials on list 205.606 received a substantial number of comments in favor of their continued need in organic handling. Several commenters cited that some substances were available in organic form, such as soy lecithin, and had concerns that there will be no market for the organically produced substance if the non-organically produced substance remained on the list. However, other commenters noted that the organic form is either insufficient in quantity or inadequate in form. No commenters provided adequate data to support their position.

Soy lecithin received conflicting comments regarding its availability in sufficient form. The TAP review of soy lecithin conducted in 1995 did not provide adequate information to help the committee make a determination for removal or continuation. Therefore, the committee recommends this substance be deferred until further information can be obtained.

Comments specifically opposing continued use of cornstarch, gums – water-extracted only, and kelp were based on the commenter’s assertion that these items are now commercially available in organic form. Information such as supply source, supply quantity, functionality, performance, test data, and name and address of producers, who have used the material under similar conditions, was not supplied by the commenters for the Board to make a decision to discontinue the use of these materials under section 205.606. In addition, no comments were received from manufacturers or suppliers of these substances regarding availability in appropriate form, quality or quantity. Because such information was not provided in any of the comments the handling committee recommends the continued use of these materials.

There were no comments specifically opposing the continued use of Pectin (high-methoxy).

### **III. Committee Recommendation(s):**

The handling committee recommends the renewal of the following substances in this use category:

Cornstarch (native)  
Gums – water-extracted only (Arabic, guar, locust bean, carob bean)  
Kelp – for use only as a thickener and dietary supplement  
Pectin (high-methoxy)

The handling committee recommends deferring the vote on the following materials until further technical information is obtained. The materials to be deferred are:

Lecithin-unbleached

The handling committee recommends not renewing the following substances in this use category based on the submitted evaluation forms:

None in this category

Moved: Julie Weisman                      Second: Bea James  
Committee vote: Yes 4      No 0      Absent 1